

# EXHIBIT “O”

**From:** GARY LIGHTMAN garylighman@lightmanlaw.com

**Subject:** continuing failures of Weiss and Zekaria to comply with Court Orders and to produce the February 2022 retainer/escrow agreement

**Date:** May 14, 2024 at 8:56 AM

**To:** Patrick Healey phealey@rebarkelly.com, Gary Weiss wgary4109@gmail.com, monipair monipair@aol.com

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Gary Weiss, and Daphna Zekaria (c/o Patrick Healey, Esquire),

Judge Younger previously entered Orders in this case which in relevant part directed the Weiss Defendants and the Zekaria Defendants to produce all documents responsive to plaintiff's Document Requests served on the defendants.

So we find it incredible and inexcusable that to date, each of you continue to fail and refuse to comply with the Court Orders and to produce the February 2022 retainer/escrow agreement that both Zekaria and Weiss admitted in their respective depositions was created by Zekaria in February of 2022. Weiss stated that he had that agreement, but was not willing to produce it to us until the "appropriate time." Zekaria admitted that she had it in her computer, and printed it out, and that it is among the papers in her office.

### **NOT ACCEPTABLE.**

Both Weiss and Zekaria have until this Friday, May 17, 2024, to produce the February 2022 retainer/escrow agreement for us. If you fail to do so, then we intend to file a Motion for Contempt and For Sanctions, as soon as possible thereafter. If Zekaria cannot locate the document among the numerous papers in her office, then just print out another copy of it. But our patience with the continuing failures and refusal of Weiss and Zekaria to comply with Court Orders and to produce February 2022 retainer/escrow agreement, is at an end. Each of you can avoid a Motion for Contempt and For Sanctions simply by emailing us a true and correct copy of February 2022 retainer/escrow agreement.

Please be guided accordingly.

thx

Gary Lightman

cell 215-760-3000

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PS to Patrick — we are sending out a Deposition Notice for Zekaria at the end of today — if you want input into the date we select, please call me (on my cell), asap, today. thx gpl

KDT—pls dy to f/u with contempt motion on 5/20 if the doc is not sent to us by 5/17 tg

—

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